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Counsel for Defendants
Alphabet Inc., Google LLC,
and YouTube, LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TYKEIYA DORE, MARC A.
STEPHENS,

Plaintiffs,

v.

CHRIS BROWN
ENTERTAINMENT, LLC d/b/a
CHRISTOPHER BROWN
ENTERTAINMENT, LLC, et al.,

Defendants.

Case No. 24-10103-MCA-MAH

Document Electronically Filed

Motion Day: July 7, 2025

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that on July 7, 2025, or as soon thereafter as
counsel may be heard, Defendants Alphabet Inc., Google LLC, and YouTube, LLC

(collectively, “Google”), by and through their undersigned counsel, shall move before the Honorable Madeline Cox Arleo, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, Newark, New Jersey 07102, for an Order dismissing Plaintiffs’ Complaint against Google pursuant to Federal Rules of Civil Procedure 12(b)(6) and 8.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Google shall rely upon the accompanying Memorandum of Law, Declaration and exhibit attached thereto, and all prior pleadings and papers on file in this action.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a certification attesting to the date and manner of service is also submitted herewith.

Dated: June 2, 2025
Newark, New Jersey

/s Alison L. Genova
Alison L. Genova
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